



**CONESTOGA-ROVERS
& ASSOCIATES**

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September 14, 2012

Reference No. 056394

Ms. Sheila Desai
Remedial Project Manager
U.S. Environmental Protection Agency – Region V
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

Dear Ms. Desai:

Re: Alternate Submittal Date Request
U.S. EPA's Comments on Remedial Investigation Report, Revision 1
Former Plainwell, Inc. Mill Property Operable Unit No. 7
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Allegan and Kalamazoo County

Conestoga-Rovers & Associates (CRA) has prepared this letter, on behalf of the Weyerhaeuser Company (Weyerhaeuser), requesting an extension to the 30-day timeframe for submittal of a revised Remedial Investigation (RI) Report for the Former Plainwell, Inc. Mill Property Operable Unit No. 7 located in Plainwell, Michigan (Site). On April 20, 2012, Weyerhaeuser submitted a revised RI Report in response to U.S. EPA comments on the RI Report, dated February 17, 2012 and U.S. EPA's November 23, 2011 comments associated with the Human Health Risk Assessment (HHRA) and Screening Level Ecological Assessment (SLERA) portions of the RI Report and on a subsequent memorandum, entitled *Proposed Modifications to Human Health and Ecological Risk Assessments, Remedial Investigation Report, Former Plainwell, Inc. Mill Property, Plainwell, Michigan*, which was submitted to U.S. EPA on November 9, 2011. Subsequently, an error was discovered associated with the Human Health Risk Assessment (HHRA) portion of the report and a subsequent revised RI Report was submitted on July 10, 2012. The revised RI Report was submitted in accordance with the RI/Feasibility Study (FS) Work Plan dated July 2009, the Multi-Area Quality Assurance Project Plan (QAPP) dated September 23, 2009, the Multi-Area Field Sampling Plan (FSP) dated November 2009, the Phase II RI Work Plan dated November 2009, the Statement of Work (SOW) for the RI/FS, and the terms of the Consent Decree for the Design and Implementation of Certain Response Actions at Operable Unit #4 and the Plainwell, Inc. Mill Property of the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site (Consent Decree), which became effective February 22, 2005.

On May 7, 2012, a Work Plan for Additional RI Activities (Work Plan) was submitted to the U.S. EPA by Weyerhaeuser to address data gaps presented in the April 20, 2012 revised RI Report. Comments on the May 7, 2012 Work Plan were received by Weyerhaeuser on June 7, 2012 and on July 9, 2012, a Revised Work Plan was submitted to U.S. EPA. Subsequently, U.S. EPA provided conditional approval of the Revised Work Plan on July 19, 2012. Implementation of the Revised Work Plan was conducted at the Site in August 2012.

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On August 30, 2012, Weyerhaeuser received U.S. EPA's comments on the July 10, 2012 revised RI Report, which indicated that the RI Report was disapproved and that Weyerhaeuser had 30 days to submit a revised RI Report, consistent with the comments provided.

Implementation of the Revised Work Plan in August 2012 included the collection of groundwater samples from all new and existing monitoring wells. Based on recent communication with analytical laboratory, receipt of groundwater data is anticipated by September 19, 2012. In order to complete data validation and incorporate results from the additional investigation into the revised RI Report, Weyerhaeuser is requesting an extension to the 30-day timeframe identified in U.S. EPA's August 30, 2012 letter until October 19, 2012. Additionally, Weyerhaeuser requests that only one hard copy of the revised sections of the document be submitted to the U.S. EPA and MDEQ, along with an electronic copy and a "track changes" version of the text to facilitate review of the revised document.

Should you have any questions or require any additional information, please do not hesitate to contact us.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Gregory A. Carli, P. E.

JQ/ejh/2

Encl.

cc: Paul Bucholtz (MDEQ) - electronic only
Jim Saric (U.S. EPA) - electronic only
Leslie Kirby-Miles (U.S. EPA) - electronic only
Erik Wilson (City of Plainwell) - electronic only
Richard Gay (Weyerhaeuser) - electronic only
Joe Jackowski (Weyerhaeuser) - electronic only
Martin Lebo (Weyerhaeuser) - electronic only
Michael Erickson (Arcadis) - electronic only
Dawn Penniman (Arcadis) - electronic only
Garry Griffith (Georgia-Pacific, LLC) - electronic only
Jeffrey Lifka (Tetra Tech) - electronic only
Jennifer Quigley (CRA) - electronic only